

Aron M. Oliner (SBN: 152373)
Geoffrey A. Heaton (SBN: 206990)
DUANE MORRIS LLP
One Market Plaza
Spear Street Tower, Suite 2200
San Francisco, CA 94105-1127
Telephone: (415) 957-3000
Facsimile: (415) 957-3001
Email: gheaton@duanemorris.com

Attorneys for Chapter 7 Trustee
E. LYNN SCHOENMANN

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re
ACEH CAPITAL, LLC,
Debtor.

Case No. 21-30299 DM
Chapter 7

**APPLICATION FOR ORDER
APPOINTING COUNSEL FOR TRUSTEE**
[NO HEARING REQUIRED]

TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY JUDGE:

E. Lynn Schoenmann, Chapter 7 Trustee (“Applicant” or “Trustee”) respectfully represents and alleges:

1. This case was filed as a Chapter 7 case on April 21, 2021. Applicant is the Chapter 7 Trustee in this case.

2. During the course of the administration of the estate, it will be necessary for Applicant to engage counsel in the aid of her administration. Applicant desires to employ as her counsel Duane Morris LLP. The reason for the selection of said attorneys is that Applicant knows them to possess the requisite integrity, skill, intelligence and familiarity with proceedings under the Bankruptcy Code so as to enable them to perform professional services beneficial to Applicant and to the creditors of the estate.

1 3. The professional services which counsel are to render to Applicant include the
2 following:

3 a. To assist the Trustee with investigating into and potentially selling personal
4 property of the Debtor and obtaining Court approval of the same;

5 b. To examine the validity of claims filed against the estate and object to claims
6 as necessary;

7 c. To investigate into the nature and extent of the Debtor's assets;

8 d. To investigate into, and, as applicable, assist the Trustee with avoiding and
9 recovering, fraudulent or preferential transfers made by the Debtor;

10 e. To investigate into and, as appropriate, prosecute other potential claims and
11 theories of recovery by the estate;

12 f. To assist the Trustee with seeking Court approval of compromises of
13 controversy and other matters; and

14 g. To advise Applicant generally and perform services on behalf of Applicant
15 on all other matters which might arise during the pendency of this proceeding.

16 4. Applicant has made diligent inquiry and, except as described in counsel's
17 declaration, said counsel has no connection with the Debtor, creditors, parties-in-interest, their
18 respective attorneys and accountants, the United States Trustee, or any person employed in the
19 Office of the United States Trustee.

20 5. Applicant is informed and believes that the normal billing rates of the law firm of
21 Duane Morris LLP at the time of this Application range from \$600.00 to \$550.00 per hour,
22 depending on the skills and seniority of the attorneys and legal assistants performing the legal
23 services. A list of said professionals and their hourly rates is attached hereto as **Exhibit "A"** and
24 incorporated herein by reference. It is contemplated that said attorneys will seek compensation
25 based upon normal and usual billing rates in effect as of the date legal services are rendered. It is
26 further contemplated that said attorneys may seek interim compensation during the case as
27 permitted by 11 U.S.C. §331.
28

1 6. Applicant is informed and believes, and based thereon alleges, that the employment
2 of said counsel would be in the best interest of this estate and its creditors.

3 **WHEREFORE**, Applicant prays that she be authorized to employ Duane Morris LLP,
4 generally as her attorneys to render services as described herein with compensation to be paid as an
5 administrative expense in such amounts as the Court may hereafter determine and allow.

6 Dated: April 13, 2021

7 
E. LYNN SCHOENMANN

EXHIBIT A

EXHIBIT “A”

2021 PROFESSIONAL FEE SCHEDULE

<u>Attorneys</u>	<u>Hourly Rate</u>
Aron M. Oliner	\$600.00
Geoffrey A. Heaton	\$550.00